

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN16
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Anthony David Thomas, et al.,

Plaintiff,

Case No. 2:24-cv-10250-SKD-FTM

V.

Hon. Sean F. Cox

BETWEEN:

Richard Lee Robinson, et al.,

Defendants,

AMENDED COMPLAINT

MAR 08 2024

JURY TRIAL DEMANDED
With Optional Consent
Degree Requests, andCLERK'S OFFICE
DETROIT

ALVIN D. FRAZIER, SR.,

Class Party - Plaintiff,

Case No. 2:24-cv-10250-SKD-FTM

V.

Hon. Sean F. Cox

EMERGENT:

Unknown Mr. Ellis, Unknown Mr. McBee,

NEWLY AMENDED COMPLAINT

Unknown Trotter, Unknown Ms. Haskins,

With Jury Trial Demanded,

Mr. R. Mask, Unknown Ms. Sutherland (And Consent Degree Option

Unknown Mr. Willis, Unknown Ms. Reeser) Request of Alvin D.

Unknown Mr. Brown, K. Cargo, Unknown (Frazier, Sr. A Now

Mr. M. McCullum, Jane Does and) PAROLABLE Prisoner

John Doe, K. Myzzik & C. Tagett, (Of STATE OF MICHIGAN

Defendants-Respondents!

VERIFIED EMERGENT AMENDED COMPLAINT MOTION

72. A motion to Alter or Amend the Judgment in my prior Complaints first option would have been to file a Motion to Alter or Amend there Judgments Under Federal Rules of Civil Procedure Rule 59(e). The motions would have had to be filed within 10 days after inconsistent page numbers

I had received entry of Judgment, I would have had to move quickly and include a Memorandum of Law that cites the case from my Circuit Court. I could make this kind of motion if the court dismisses my Complaints, denies me leave to amend or grants Summary Judgment to the defendants. These are newly discovered evidence stated for alteration and Amendments below:

ALTERATIONS AND AMENDMENTS IN COMPLAINT

Note: Some numbered paragraphs may be listed more than once but will have different defendants named, or sometimes the same defendants with other named amended defendants in some numbered paragraphs hereafter:

1. Since I, Plaintiff Alvin D. Frazer Sr., road out from Cotton (JCF) prison to Parnall (SMT) prison I have no doubt in my mind now by no shadow that the officials from Cotton (JCF) prison riding me out was done out retaliation! To briefly explain since 2016 of December I been at Cotton (JCF) after arriving from Michigan Reformatory (MR) prison to continue engaging in Chance for Life (CFL) program and Jackson College, Albion College, University of Michigan I had problems with some prisoners and Staff members involving "Hate Crimes" against me by Co/Hokanson, prisoner Joe Chambers, and I had filed litigation in that matter

as of now I am at Parnall (SMT) prison in ~~the~~ separate unit than prisoners Chambers who once through a punch at me while working in Cotton (SCE) prison Temp-Side Kitchen when I never engaged or attempted to through a punch at him at no time but was grabbed from behind by another racist guy who had made racist comments and I was charged even after I had received a promise from Co/Hokanson for him to make a statement on my behalf and clear me as I've seen him do for many of white persons that's prisoners like in my situation of not fighting alike instantly be he never even made a statement on my behalf or ever showed up to segregations but for whitemen I've seen him instantly done and brought them right back to work.

2. The Urgent issue I am having at this time is that another prisoner I am here with that use to be my Cubie in TE-Unit at Cotton (SCE) prison publicly just informed me that he had placed store goods on my bunk due to knives Correctional officer J. Savick and Ms. C. Henry started and reported was found in my living area of control, and unknown ALJ Ms. Unknown Sutherland from Lansing found me not guilty for High Unlikely to be.

3. fact is the prisoner first name is Andre, I don't know his last name pff log books does. I remember from passing callouts in Cube-out, I also

had litigated that issue because J. Savicke and C. Henry was defendants in litigation pending against them at Cotton (JCF) prison at that time they both had seen their names on lawsuit papers in my legal blue footlocker I had received from Courts decisions due to their actions that violated my rights as a State of Michigan prisoner prior to April 15, that Copies of findings from A.J Ms. Subbarao was found by them destroyed my family has copies and me being found not guilty by Ms. Subbarao is of Court record Judge Grand Court in Ann Arbor, Michigan. I now claim that the A.J Ms. Subbarao et al, after reviewing in some footage involving the knives (2) were planted in my area of control for her would have reviewed the entire video of the April 15th, Mass Shake down at Cotton (JCF) to expose the persons who set me up. All peoples involved are white men prisoners and Noah Nagy, et al women that seemed to have good relationship with prisoners seemed to been involved that's proved now since my arrival to Parnall (SMI) where the prior Warden Noah Nagy is now at as everyone was at Cotton (JCF) prison is here at Parnall (SMI) while his successor is Ms. K. Largo at Cotton (JCF) prison.

4. I, Plaintiff Alvin Frazier Sr., Mdm once when I was at Cotton (JCE) prison I heard a prisoner voice while having conversation on politic topic Heidi E. Washington being spoke on being hurt by prisoner Angel #400666, inmate number stating what someone should do to her, etc., I reported what was said because if something ever was to happen to her after what I heard and happen I didn't want what I heard to become reality. Another part of my Conscience that will hurt my Conscience for the rest of my life daily because throughout my life I've had enough of that. I ask that the Court adjust, adapt, revise an Consent Decree with me in consent with re-entry changes to settle these matters because I been labeled as a Snitch due to speaking up for the State of Michigan - Michigan Department of Corrections prisons Heidi E. Washington I never thought I would be placed in danger for doing the right thing that will maybe help our State of Michigan elected government Director of prisons officials.

WHEREFORE, Plaintiff Alvin D. Frazier, I am ask the Court to adopt the above alterations and Amendments hereafter of Paragraphs 49, 50; 53, and defendants to assure responsibility is aimed at those responsible because all parties had prior knowledge.

February 26, 2024 /S/ Alvin D. Frazier, Esq.
In pro per

See Next Page

AMENDMENTS OF PARAGRAPHS

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Amended Paragraphs: 49, 50, 53 hereafter:

49. A.A; Administrative Assistant; K. Napier, "is the Cotton (JCF) prison influential administrative initial contact person in position for also Litigation Matters." She is responsible; and the CFM: Cotton (JCF) Correctional Facility Manager T. Schubring, is responsible for making sure all Cotton (JCF) prison Operational procedures and Policy Directives of the MDOC is carried out to meet requirements of the State of Michigan Legislature's enactments, Michigan Supreme Court, Michigan Court of Appeals and Federal Courts of the State of Michigan Laws, Court rules, and the United States Supreme Court to protect prisoners from their Constitutional rights being also violated. Also, Arus; Assistant Resident Unit Specialist R. Mask is ("Counselor") at Cotton (JCF) that is essentially the same as TF-unit Arum Mr. Unknown Willis just slightly reduced to a level of responsibility and pay. Arus Mr. Mask is responsible for Amendments I prior mailed to Court to February 7th 2024, of my retaliatory ride-out expedited be done by Arum Mr. Willis. The Assistant Resident Unit Manager (Arum ("Counselor")) of TF-Unit Cotton (JCF) prison Mr. Willis is responsible for assisting with Management of G. Robert Cotton Correctional Facility (JCF) Temp-Side where I was assigned to live-in housing Units (TF-TF-Units), minus the four TA, TB, TC, TD Closed Condemed Temp-Side Units when online it's stated the entire Cotton Temp-Side is Closed, but that's disregarded. Mr. Willis brag about cars to Co/Mr. Slicker and having sex with K. cargo, warden.

Continued: AMENDMENTS OF PARAGRAPHS

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Amended Paragraphs 49, 50, 53

49. Inspectors: K. Muzzin & L. Tagett are both responsible for investigating specific issues and incidents that occur at Cotton (JCF) prison. There are at least two inspectors' at Cotton (JCF) prison, and has been at all times. Both inspectors' named in this paragraph are responsible for disregarding inspections in regards to Cotton (JCF) prisoners units on Temp-Side lack of up-keeping causing serious medical problems with breathing. Cotton (JCF) prison Warden K. Largo is responsible because she had prior knowledge I personally gave to TF-unit Arus R. Mask through Email and sent to County my attorney friends in "Consent Degree Request" Copies, and proof is in Warden Ms. K. Largo response to grievances I, Plaintiff Mr. Frazier, Sr. filed that was reason I was expedited a ride-out from Cotton (JCF) prison that prevented me from seeing the Parole Board during the week of the 15th of February month and 2024 year. Interestingly the Assistant Deputy Warden Mr. M. McCollum, (ADW); is the G. Robert Cotton prison Facility ADW over the TF-unit and TE-units areas, i.e.; ADW of Housing that I've personally seen do rounds in my assigned TF-Unit living areas but disregard inhumane conditions. Everyone named in these paper filings are responsible for disregards of Constitutional rights, prisons rules, etc. Will is charge of having sex to Brown with women of Henry, K. Largo, Warden. ?

Continued: AMENDMENTS OF PARAGRAPHS Page 10 of 17Amended Paragraphs 49, 50, 53

49. R/W/O'S: TF-Unit Cotton (JCF) named hereafter are; Resident Unit Officers, Unknown Mr. McBee, Mr. Unknown Trotter, Unknown Mr. Bollinger, Ms. Unknown Reese, Mr. Unknown Brown, Mr. Unknown Ellis, Ms. Unknown Jane Doe, SGT. Ms. Unknown Hawking, are Corrections officers who does rounds in Cotton (JCF) Temp-Side prison level-one units, and also works inside Temp-Side Housing units assigned for prisoners' to live-in areas that I have seen disregard their jobs duties inside my assigned TF-Unit living area recently. I've lived in every prison unit on the Cotton (JCF) prison Temp-Side of level one from December 2016 through February 7th 2024 this present. All defendants named above are responsible for violating Federal Law Rules, and prison rule in concert with violating my Constitutional Rights. Fact is, after I talked to the Cotton (JCF) prison (CFM) T. Schubring First at approximately 5 minutes to 12pm on Friday 2nd day of February 2024 during launch time I communicated to him the need of TF-Unit Heating system needing H-Vac Cleaning service done and latter brought in to Clean TF-Unit Fans while scanning my Trade before I got my launch tray, to no resolve. Then after my finishing eaten my launch meal I dumped my launch tray between 12:10pm through 12:20pm approximately and walked back up to him in Temp-Side Cafeteria then

Continued: AMENDMENTS OF PARAGRAPHS Page 11 of 17Amended Paragraphs 49, 50, 53

Continued: 49. I communicated to T. Schubring, the (CFM) what my TF-Unit officers, Arus; Mr. Mask; Arum; Mr. Unknown Willis had communicated to me on topic of why a fan could not be brought over to Clean TF-Unit Fans, and reiterated officers stated: "That all above was told not to do so by both Cotton (JCF) prison Inspectors K. Mazzin & C. Tagett, and all named in this paragraph disregarded serious dangerous health Causing issues with prisoner breathing.

Paragraph: 50. Arum Unknown Mr. Willis got upset and stated: "Don't worry about heater vents or fans not being clean because I put in a special procurement to fix the problem." From my experience being at Cotton (JCF) Since December 2016 year that's not how that is done because I myself used those forms to order Bibles and other books for Religious Service Studies. I been in College programs and graduated August 3rd, 2023, but I was road out before I Seen Parole Board scheduled meeting for the week of the 15th of February 2024 out retaliation. I allege that the retaliation happen because I wrote a Correctional officer up under PREA rules assault and Hate Crimes due to Co/Unknown Brown walked through TF-Unit, on a high-ego horse because he was said to be assigned as a regular TF-Unit Corrections officer but stated On February 6th 2024, as I stood at officer desk talking

Continued; AMENDMENTS OF PARAGRAPHS Page 10 of 17Amended Paragraphs, 50, 53

Paragraph 50: Continue; 50. to Correctional Officer Mr. Unknown McBee that; "I seen your paperwork" due to I filed a grievance on Co/Unknown Brown for assault and sexual Misconduct PREA reasons I also had prior discussed with some officials Mr. McBee, et al, Medical team at Cotton (JCF) prison that week I was road out-out retaliation and my claim of PREA disregarded.

Paragraph 53: 50; 53. Defendant Brown use of abusive, profane language, threatening behaviors and actions which degraded me, belittled me while in Chaplain Mr. Thompson office while placing my studying Religious book materials back in the assigned Hebrew Israelite Service group locker was inhumane treatment against and to me then and assault when Mr. Unknown Brown threw my King James Hebrew Israelite Study Bible on my feet while in Chaplain Mr. Thompson office at Cotton (JCF) in 300 building on February 3rd, 2024, between 1850hr through 1950hr. Defendant Mr. Brown I ask to be found in violation of (MDOC) Department work rules and (JCF) prison policy along with Civil Service rules of ICS Commission Rule 2-100.3(b) where it applies to the ADA. All defendants named in this paragraph are responsible for disregarding their job duties, and Plaintiffs Constitutional Rights of the State of Michigan. I ask for Administrative hearing because inaccurate PSI information. 12.

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Amended Paragraphs 50, 53

Paragraph:

50. On February 3rd, 2024, Defendant Mr. Unknown Brown when I Showed up to my religious call-out would not allow me in the 300 building despite my arriving timely to 6:00pm Hebrew Israelite Religious Service even though other level Two prisoners could be seen entering the 300 building through double doors from level Two side; and when I was allowed to enter building Mr. Unknown Brown threw bible down after asking me to see my King James Study Bible with the Apocrypha books included in it for studying that landed on my feet. Co/Mr. Brown Stated; "King James was an incestuous man. You should not be study out this bible because he had sex with his own Mother. You got the wrong bible to study out of." Co/Sir Unknown Brown did not stop there, he called another prisoner over who walked up to me and Co/Brown to ask Keith X a very well known prisoner, "Duh you know about King James was an incestuous man who had sex with his own mother?" The other prisoner stated; "man Frazier Know or Should know and walked out." I know this prisoner to be a good guy I get along with that's from another religious group because I often seen him in 300 building when I facilitated Peace Education Program of the Prem Rawat Foundation PEP.

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Amended Paragraphs, 50; 53

Paragraph:

50. At all times relevant to this case, I Plaintiff Alvin Frazier, Sr., prison number 379628, and others Hebrew ISrealite Studying men who believe in Jesus has Shared Studies in the 300 School programs Cotton (JCC) prison building room 108 here at all times as stated could be proven through a State of Michigan Certified Notary Public Department of Corrections Employee as stated below:

Paragraph:

53. The prior Friday, 2nd day of February 2024, right before Saturday, the 3rd day of 2024, I spoke with Arus R. Mask in TF-unit inside his office about Conditions of Confinement other Staff Violations of my Rights of the State of Michigan Constitution, Legislature's enactments and Cotton (JCC) Policy Directives and operational Procedure rules, and gave him reminder of the January 31st, 2024 "request for Considering a Consent decree" I submitted through I.D. Mail to K. cargo, the Courts expedited legal mail, and an Attorney Friend and Family member through regular mail his Notary done as witness to Allegations, Claims, Stated facts as being true he agreed but asked me not to forge his Notary I find hard to be done when I made sure he did a Stamped Seal on all Notaries done prior on January 31st, 2024 concerning all of the above mentioned statements. I communicated to

Continued: AMENDMENTS OF PARAGRAPHS Page 15 of 17Amended Paragraph 53.Paragraph:

53. Am I R. Mask the TF-can't regular Prisoner Counselor the need to Clean the Unit fans in TF-unit, and requested that I be allowed to myself but no resolve even after I was told that inspector Mazzin & Tagett told Trotta when he had went to get a letter and was on his way back from the Self-Port area to TF-unit to "Take the letter back because that's a job only maintenance Crew members who are Certified only are allowed to do." I find that intentional creating living conditions that's inhumane when there were five maintenance Crew members who lived in TF-unit with me, and myself who had always got on letters at Cotton(JCF) to Clean fans in Temp-Side units and all the fans in Temp-Side Cafeteria food Service areas as I expressed to T. Schubring the Cotton(JCF) prison Business Manager who had witnessed that I did all the above in person at my job when I was employed at Cotton (JCF) Food Services.

FACTS ARE

PLRA does not restrict Settlements that only deal with Money where I, Alvin Frazier, Sr., am asking only for money, not a restraining order in junction. Honestly, I ask for a private meeting and promise to be discreet.

Continued: AMENDMENTS OF PARAGRAPHS Page 16 of 17

Amended Paragraphs REDACTED FACTS ARE below:

Paragraph: Facts are: I have studied the laws on this topic like through a bird eye view and the restrictions discussed in Cotton (JCF) prison Policy Directive PD.03.02.130 does not apply.

RELIEF Sought

WHEREFORE, I, Alvin D. Frazier, Sr, as an requestor for a consent degree, an Class Action 1983 party of Case No. 2:24-cv-10250-SFC-PTM with the Honorable Sean F. Cox as the presiding Justice in case of Anthony David Thomas, et al. v. Richard Lee Robinson, et al., Defendants^{plaintiffs}, I ask that due to my allegations made in class action paragraphs 40 through 70, and whatever is fact originally asked for Relief in paragraph 76, with the exception that although an Consent degree don't ask for an injunction or restraining order since I've been moved from Cotton (JCF) days away from seeing the Parole Board as Scheduled for the week of the 15th of February 2024, in consort with dangerous reasons listed in this requests and Noah Nag Y, the now Parnall (SMT) warden being original defendant if any other harm or misconduct be against me be deemed Retaliation. This court to Grant or defendants negotiate a fair Settlement.

Date: February 26, 2024 15th Alvin D. Frazier

VERIFICATION

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I am the requester of new amendments in Consent degrees from New Consent Degree Request to Court approval at this instant Emergent Request Motion for Leave to Amend Complaint, and party to Class action to have paragraphs 49, 50, 53 Amended before mentioned of Content. I am in proper and I verify that my requests that I ask for now are for Sincere reasons I have given after I recently discovered new true facts for my own knowledge those matters of unseen prisoner original had Knives I was charged with, unseen M.D.O.C. Employee placing weapons in my area of control. I have read and declare, verify, under penalty of perjury under 28 U.S.C. §1746, to contents of these papers as being true and these paper filings are true. I've read the State of Michigan perjury Statute set out in its rules and above I am aware of penalties for giving false information in verified statements.

Alvin D. Frazier Sr. #379628 February 26, 2024

Signature of Affiant Petitioner Date

CERTIFICATE OF SERVICE

I Alvin D. Frazier Sr. #379628, the Petitioner and Plaintiff as a class action member certify that on February 26, 2024, I mailed these papers from Parnall Prison (SMT) a prisoner by placing papers in envelope with expedited legal mail form in prisoners unit 10 block Counselor hands to go out in outgoing prisoners legal mail.

(S)

Dated: February 26, 2024

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Alvin D. Frazier, Sr., in proper
1780 Parnall Road
Jackson, MI 49201

Prisoner Name: Alvin D. Frazier, Sr.
Prisoner Number: 379628
PARNALL CORRECTIONAL FACILITY
1790 E. Parnall Rd.
Jackson, MI 49201-7139



To: Clerk of the Court
United States District Court
Clerk's Office
231 Lafayette Boulevard
Detroit Michigan 48226